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March 29, 2023

**VIA ECF**

Hon. Judge Jennifer H. Rearden  
United States District Court Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007

*Re:* Defendant Thomson Reuters Corporation's Request for Oral Argument in *Leslie v. Thomson Reuters Corporation*, No. 1:22-cv-07936

Dear Judge Rearden:

Defendant Reuters News & Media Inc., sued herein as Thomson Reuters Corporation ("Reuters"), by and through its counsel, Baker & Hostetler LLP, pursuant to this Court's Individual Rules and Practices in Civil Cases 5(F), respectfully requests oral argument on its pending Motion to Dismiss Plaintiff's Class Action Complaint (Dkt. 22-23) and Motion to Strike Class Allegations (Dkt. 24-25).

Oral argument would be beneficial to the Court's consideration of Reuters' Motion to Dismiss because, among other things, Video Protection Privacy Act ("VPPA") litigation has exploded in the last year and interpretation of the statute is still quite limited. A more robust and careful consideration of the novel arguments raised in Reuters' briefing through oral argument could, therefore, advance the Court's understanding of the statute and how the Facebook Pixel, often involved in these new VPPA cases, works. Indeed, Reuters has presented novel arguments regarding how the Facebook Pixel operates including several citations, that are judicially noticeable by this Court, which demonstrate that Reuters does not disclose Plaintiff's personally identifiable information. Reuters has also presented arguments about the constitutionality of the VPPA, both on its face and as applied to a news organization like Reuters—an application which would have the practical effect of restricting how Reuters is able to deliver the news. These complex constitutional arguments warrant time to be orally argued before your Honor for their full consideration.

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Next, oral argument would be beneficial to the Court's consideration of Reuters' Motion to Strike. Resolution of the issues presented in that motion could significantly streamline the case and eliminate the need for any class-related discovery or class-certification motion practice. Oral argument would help ensure these issues are fully explored at an early juncture, so that the parties' and the Court's resources are not spent unnecessarily on class-related issues.

Reuters, therefore, respectfully requests that the Court grant its request for oral argument on its pending Motion to Dismiss and Motion to Strike.

Respectfully submitted,

Baker & Hostetler LLP

*/s/Bonnie Keane DelGobbo*

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Partner